

### **REMARKS/ARGUMENTS**

The office action mailed August 23, 2006, has been carefully reviewed, and these remarks are responsive to that office action. Reconsideration and allowance of this application are respectfully requested.

Claims 1-14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Flanagan, et al. (US 6,993,471) in view of Kennelly, et al. (US 6,559,861). Claims 1-13 remain in the application. Claim 14 has been cancelled without prejudice or disclaimer.

Flanagan and Kennelly do not support a proper prima facie case of obviousness of claim 1 because these references, either alone or in combination, do not disclose, teach, or suggest "receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed," and these references, either alone or in combination, do not disclose, teach, or suggest, "at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user."

Claim 1 recites a computer-readable medium having computer-executable instructions for performing steps comprising: allowing a user to select a language in which at least a portion of an electronic file is to be displayed; receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed; at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user; and displaying to the user the second plurality of phrases that are expressed in the language selected by the user.

Flanagan discloses downloading an HTML document with content expressed in English and then using machine-translation software to translate the text into a user's native language. (Flanagan, col. 3, line 44, through col. 5, line 16). Flanagan discloses translating downloaded

English documents into a different language. Flanagan does not disclose downloading documents that contain words that are expressed in multiple spoken languages, such as English, French, Spanish, Italian, and the like. Flanagan does not, therefore, disclose, teach, or suggest "receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed." Therefore, Flanagan also does not disclose, teach, or suggest, "at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user."

Kennelly discloses translating text of a computer user interface by using separate language-specific files, which are stored in separate language-specific subdirectories, for each respective language translation. (Kennelly, col. 6, line 45, through col. 9, line 56). Kennelly does not, therefore, disclose, teach, or suggest "receiving the electronic file at the user's computer, wherein the electronic file's content includes a first plurality of phrases, wherein each phrase of the first plurality of phrases is expressed in a plurality of languages and has a meaning that is different than the meanings of other phrases of the first plurality of phrases regardless of the language in which said each phrase is expressed." Therefore, Kennelly also does not disclose, teach, or suggest, "at the user's computer, selecting, for display to the user, from the first plurality of phrases, a second plurality of phrases that are expressed in the language selected by the user."

For at least the foregoing reasons, Flanagan and Kennelly, either alone or in combination with the other prior art of record, fail to establish *prima facie* obviousness of the invention of claim 1.

Flanagan and Kennelly do not support a proper *prima facie* case of obviousness of claim 6 because Flanagan does not disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, (2)

receiving the electronic file from a sending computer, and (3) inserting the translation obtained from the electronic file into a translated electronic file.

Claim 6 recites a method of providing an electronic file to a user comprising the steps of: assigning to at least one word in the electronic file a plurality of identifiers, wherein each identifier corresponds to one of a plurality of respective translations in the electronic file for said at least one word; and at a receiving computer: receiving the electronic file from a sending computer, allowing the user to select a language in which at least a portion of the electronic file is to be displayed, using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, inserting the translation obtained from the electronic file into a translated electronic file, and displaying the translated electronic file to the user.

Flanagan discloses downloading an HTML document with content expressed in English and then using machine-translation software to translate the text into a user's native language. (Flanagan, col. 3, line 44, through col. 5, line 16). Flanagan discloses translating downloaded English documents into a different language. Flanagan does not disclose downloading documents that contain words that are expressed in multiple spoken languages, such as English, French, Spanish, Italian, and the like. Flanagan does not, therefore, disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the electronic file, a translation, in the language selected by the user, for said at least one word, (2) receiving the electronic file from a sending computer, and (3) inserting the translation obtained from the electronic file into a translated electronic file.

Kennelly discloses translating text of a computer user interface by using separate language-specific files, which are stored in separate language-specific subdirectories, for each respective language translation. (Kennelly, col. 6, line 45, through col. 9, line 56). Kennelly does not, therefore, disclose, teach, or suggest performing the following steps at a receiving computer: (1) using an identifier from the plurality of identifiers, wherein the identifier corresponds to the language selected by the user, to obtain, from the respective translations in the

electronic file, a translation, in the language selected by the user, for said at least one word, (2) receiving the electronic file from a sending computer, and (3) inserting the translation obtained from the electronic file into a translated electronic file.

For at least the foregoing reasons, Flanagan and Kennelly, either alone or in combination with the other prior art of record, fail to establish prima facie anticipation or obviousness of the invention of claim 6.

Claims 2-5 and 7-13 properly depend upon claims 1 and 6, respectively. Therefore, these dependent claims are in condition for allowance for at least the reasons discussed above in connection with claims 1 and 6.

### **CONCLUSION**

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicant respectfully submits that this application is in condition for allowance, and respectfully requests issuance of a notice of allowance.

Respectfully submitted,  
BANNER & WITCOFF, LTD.

Dated: November 24, 2006

By:           /William J. Klein/            
William J. Klein  
Registration No. 43,719

10 S. Wacker Dr., Suite 3000  
Chicago, IL 60606  
Tel: (312) 463-5000  
Fax: (312) 463-5001  
WJK/ab